



# Swinomish Indian Tribal Community

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A Federally Recognized Indian Tribe Organized Pursuant to 25 U.S.C. § 5123

September 3, 2019

**Federal Communications Commission**  
**445 12<sup>th</sup> St SW**  
**Washington, DC 20554**

*Via electronic submittal at <https://www.fcc.gov/ecfs/filings>*

Dear Sir or Madam,

The Swinomish Indian Tribal Community (the “Swinomish Tribe”) is a federally recognized Indian tribe organized pursuant to Section 16 of the Indian Reorganization Act of 1934, 25 U.S.C. § 5123, which occupies the Swinomish Indian Reservation on Fidalgo Island in northwest Washington. 83 Fed. Reg. 4235, 4239 (Jan. 30, 2018). The Swinomish Tribe carries out broad tribal health programs, including comprehensive dental and medical programs, through a self-governance compact and funding agreements with the Indian Health Service (IHS) under Title V of the Indian Self-Determination and Education Assistance Act (ISDEAA), 25 U.S.C. §§ 5301 *et seq.*

The Swinomish Tribe offers the following comments on the draft proposed pilot program for **Promoting Telehealth for Low-Income Consumers, WC Docket No. 18-213**:

1. The Swinomish Tribe strongly supports the proposal to provide additional points for projects serving tribal members on tribal lands (#47 and #48);
2. The Swinomish Tribe does not agree that tribal land certification should also include and comply with any rural area definition; rather, certifying that services are provided on tribal lands should be sufficient certification to ensure services are provided in areas well-documented to have significant health care shortages and where there are well-documented health care disparities (#50);
3. The Swinomish Tribe supports additional points for projects that focus on treating chronic health conditions and that provide treatment related to health crises, such as opioid dependency (#52).

Thank you for considering these comments.

Sincerely,

Stephen T. LeCuyer, Director